

Appl. No. 09/706,937  
Amdt. dated April 14, 2005  
Reply to Office action of January 14, 2005

### REMARKS

This is in response to the Office Action mailed on January 14, 2005. The Office Action rejected Claims 1-3, 5-6, 8-10 and 14 as anticipated by U.S. Pat. No. 6,609,062 ("Hancock"). The Office Action rejected Claims 4 and 11 as obvious in view of the combination of Hancock and U.S. Pat. No. 6,327,535 ("Evans") and rejected Claim 12-13 as obvious in view of the combination of Hancock and U.S. Pat. No. 6,470,287 ("Smartt").

Applicants respectfully request reconsideration of the pending claims in view of the following remarks. Applicants submit that all of the pending claims in the present application are allowable, as explained below.

#### Independent Claim 1

Applicants' independent Claim 1 relates to an index for data that represent geographic features. The index has a structure that includes three dimensions. The first and second dimensions of the index are spatially searchable. A third dimension includes rank information, and the third dimension of the index is searchable for a rank of the geographic features represented by the data.

Applicants' independent Claim 1 was rejected as being anticipated by Hancock. Applicants submit that Hancock does not anticipate Claim 1 because Hancock does not disclose all of the elements of this claim. Specifically, Hancock does not disclose the recited limitation of the third dimension of the index that includes rank information, wherein the third dimension is searchable for a rank of the geographic features represented by the data.

Briefly, Hancock discloses a geographical referencing system using nesting grid structures. (see: Hancock, column 1, lines 22-25). Hancock provides a locational address of a point of interest within the geographic region using the grid structure. For example, the point of interest may be a house that may be specifically identified by the address U.S.CA.LA.11.17.18.12 wherein US indicates United States, CA indicates California, LA indicates Los Angeles grid, 11 indicates the location is within cell 11 of the Los Angeles grid. The remaining digits of the address indicate sub-grids and sub-cells that provide greater resolution of cell 11 to identify the location of the house. (see: Hancock, column 5, lines 45-63).

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First, Hancock does not disclose an index for data that represent geographic features; rather, Hancock provides a locational address for a point of interest. Furthermore, although Hancock discloses the address using sub-grids and sub-cells to provide greater levels of resolution for identifying the location of a house as indicated by the office action, Hancock does not disclose or suggest a third dimension of the index that includes rank information and that is searchable for a rank of the geographic features. Instead of using latitude and longitude to indicate a spatial location, Hancock provides a proprietary address code to identify a location. Applicants' recited third dimension of the index allows the rank of the geographic feature to be search; in contrast, the address of Hancock only allows the spatial location to be searched. As known to one skilled in the art of geographic databases, a rank may be associated with geographic features to provide a level of detail. For example, a lowest rank (e.g., 0) is associated with those features (e.g., side streets and alleys) that are represented only when the finest level of detail is desired, and a highest rank is associated with the most important features (e.g., expressways) that are represented even at the coarsest level of detail. (see, Specification, page 2, lines 13-20). Hancock completely fails to mention a rank of the geographic features.

Because Hancock fails to disclose or suggest every claim element, Hancock does not anticipate Applicants' independent Claim 1.

#### Independent Claim 2

Applicants' independent Claim 2 was rejected as being anticipated by Hancock. Applicants submit that Hancock does not anticipate amended Claim 2 because Hancock does not disclose all of the elements of this claim. Specifically, Hancock does not disclose that a non-spatial property of the indexed data is searchable using the third dimension.

As mention above, Hancock does not disclose an index for data that represent geographic features; rather, Hancock provides a locational address for a point of interest, such as U.S.CA.LA.11.17.18.12. (see: Hancock, column 5, lines 45-63). The addressing system of Hancock provides a spatial search ability identifying the location of the geographic feature; however, it does not provide the ability to search for the claimed non-spatial property of the indexed data.

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Because Hancock fails to disclose or suggest every claim element, Hancock does not anticipate Applicants' independent Claim 2.

Independent Claim 14

Applicants' independent Claim 14 relates to an index for data that has a structure with three dimensions. The first and second dimensions are spatially searchable using those dimensions. The third dimension includes granularity information of the indexed data, and a granularity of the indexed data is searchable using the third dimension. For similar reasons as discussed above in conjunction with Claim 1, Hancock does not anticipate Applicants' independent Claim 14.

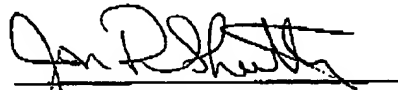
Dependent Claims 3-6 and 8-13

Applicants' Claims 3-6 and 8-13 are dependent claims that distinguish the cited references at least for the same reasons explained above in connection with their independent base Claims 1 and 2. In addition, these claims recite further features and limitations that are neither disclosed nor suggested by these references.

Conclusion

All the issues in the office action, dated January 14, 2005 have been addressed. Favorable consideration of the present application is requested. If any issues remain, the Examiner is invited to call the undersigned.

Respectfully submitted,



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